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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

PATRICIA MacMURRAY,

Plaintiff,

v.

BOEHRINGER INGELHEIM
PHARMACEUTICALS, INC.,

Defendant.

**JOINT STIPULATED MOTION TO
EXTEND DEADLINES**

Case No. 2:17-cv-00195-JNP

U.S. District Judge Jill N. Parrish

U.S. Magistrate Judge Dustin B. Pead

Plaintiff Patricia MacMurray and Defendant Boehringer Ingelheim Pharmaceuticals, Inc. (collectively “the Parties”), through counsel, hereby stipulate and jointly move the Court to extend the deadlines for the proposed ESI protocol, proposed Protective Order, and Federal Rule of Evidence 502 order. The Parties request that the deadline be extended to December 18, 2017.

The Parties submit that good cause exists to enter an order granting the proposed extension as the Parties have been working to complete these items for submission, have made good progress to date and hope to have agreed proposals to submit to the Court shortly, but have been unable to complete them within the deadlines despite diligent and reasonable efforts to do so. In addition, the extension will not affect the trial date, and the Parties agree that no prejudice will result from the requested reasonably tailored additional extension. A proposed order is submitted herewith.

<p>DATED this 8th day of November, 2017.</p> <p>SNELL & WILMER L.L.P.</p> <p><u>/s/ Elisabeth M. McOmber</u> Tracy H. Fowler Elisabeth M. McOmber</p> <p><i>Attorneys for Defendant Boehringer Ingelheim Pharmaceuticals, Inc.</i></p>	<p>DATED this 8th day of November, 2017.</p> <p>JOHNSON BECKER, PLLC</p> <p><u>/s/ Rolf T. Fiebiger</u> Rolf T. Fiebiger (<i>Pro Hac Vice</i>) Signed by filing attorney with permission of Rolf T. Fiebiger</p> <p><i>Attorney for Plaintiff</i></p>
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November, 2017, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which serves an email notification of such filing upon all counsel who have entered an appearance in this action including but not limited to the below:

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